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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CANDY CASTRO, an individual; CANDY
CASTRO on behalf of ISAAC CORDOVA, a
Minor child;

Plaintiffs,

vs.

COSTCO WHOLESALE CORPORATION, a
foreign corporation; DOES 1 through 25,
inclusive; and ROE CORPORATIONS 1
through 25, inclusive,

Defendants.

CASE NO. 2:22-cv-01318-JAD-VCF

**STIPULATION AND ORDER TO RESCHEDULE HEARING RE: STIPULATION TO
SUBMIT CASE TO SETTLEMENT CONFERENCE OR ALTERNATIVE
METHOD OF DISPUTE RESOLUTION AND STAY DISCOVERY
PENDING COMPLETION**

Plaintiffs, CANDY CASTRO (hereinafter referred to as “Ms. Castro”) and ISAAC
CORDOVA (hereinafter referred to as “Isaac”) (collectively referred to herein as “Plaintiffs”), by
and through counsel, Patrick W. Kang, Esq., Kyle Tatum, Esq. and Tiffany S. Yang, Esq. of the law
firm Kang & Associates and Michael N. Aisen, Esq. and Defendant, COSTCO WHOLESALE

1 CORPORATION (hereinafter referred to as “Costco”) by and through counsel, Edgar Carranza,
2 Esq. and Megan Wessel, Esq. of MESSNER REEVES, LLP, hereby stipulate to continue the hearing
3 date set by this Court to discuss the stipulation to submit this case to settlement conference,
4 mediation or other method of dispute resolution and stay all discovery and deadlines pending
5 completion of the same as follows:
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7 WHEREAS, this Court scheduled a video hearing for May 16, 2023, at 10:00 am to consider
8 the stipulation to submit this matter to a settlement conference, mediation or an alternate method of
9 dispute resolution in an effort to explore a potential early resolution as contemplated by Local Rule
10 (“LR”) II 16-5;
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12 WHEREAS, trial counsel for Costco has a conflict with the above date and time set by this
13 Court; and

14 WHEREAS, the Parties agree that good cause exists for the continuance of the hearing to
15 allow for the meaningful participation of both parties.
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17 THEREFORE, the Parties hereby stipulate and agreed as follows:

18 1. Plaintiffs filed their Complaint on June 27, 2022, in the Eighth Judicial District
19 Court.

20 2. On August 8, 2022, Plaintiffs filed a Request for Exemption from Arbitration, in
21 which they detailed their claimed damages.

22 3. On August 16, 2022, Costco filed its Notice of Removal of this action to this Court
23 for complete diversity jurisdiction pursuant to 28 U.S.C. 1332, 1441 and 1446 [Doc No. 1].

24 4. On May 2, 2023, the Parties filed a stipulation to submit this case to settlement
25 conference or alternative method of dispute resolution and stay discovery pending completion
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1 pursuant to LR II 16-5 [Doc No. 26].

2 5. On May 3, 2023, this Court entered an order setting a video hearing for May 16,
3 2023, at 10:00 am to consider the above stipulation [Doc. No. 27].

4 6. Trial counsel for Costco is unavailable for the hearing as currently scheduled and has
5 notified Plaintiffs of his unavailability.

6 7. In an effort to move this matter forward, the Parties have agreed to the following
7 dates on which both are available for the above hearing:
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9 a) May 15, 2023 (am).

10 b) May 18, 2023 (am).

11 c) May 23, 2023 (pm).

12 d) May 25, 2023 (am).

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8. The Parties request that this Court reschedule the above hearing for one of the dates/times indicated herein on which both have determined they are available to participate.

DATED this 9th day of May, 2023.

DATED this 9th day of May, 2023.

MESSNER REEVES, LLP

Kang and Associates

By: /s/ Edgar Carranza
Edgar Carranza, Esq.
Nevada Bar No. 5902
Megan Wessel, Esq.
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Attorney for Defendant
COSTCO WHOLESALE
CORPORATION

By: /s/ Kyle Tatum
Patrick W. Kang, Esq.
Nevada Bar No. 10381
Kyle Tatum, Esq.
Nevada Bar No. 13264
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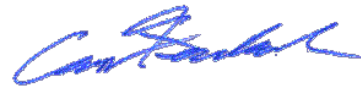
and

Michael N. Aisen, Esq.
Nevada Bar No. 11036
723 S. Third Street
Las Vegas, Nevada 89101
Attorneys for Plaintiffs
CANDY CASTRO, individually and on
behalf of ISAAC CORDOVA

IT IS HEREBY ORDERED that the video conference hearing scheduled for May 16, 2023, is rescheduled to 10:00 AM, May 15, 2023.

IT IS FURTHER ORDERED that counsel/ the parties must email the Courtroom Administrator, Tawnee Renfro at Tawnee_Renfro@nvd.uscourts.gov, with an email address to be used for the video conference hearing by noon, May 12, 2023.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

DATED 5-9-2023

Patti Sherretts

From: ktatum acelawgroup.com <ktatum@acelawgroup.com>
Sent: Tuesday, May 9, 2023 10:48 AM
To: Patti Sherretts; pkang acelawgroup.com
Cc: Edgar Carranza; hcaifano acelawgroup.com; mike@aisengill.com
Subject: Re: Costco adv. Castro

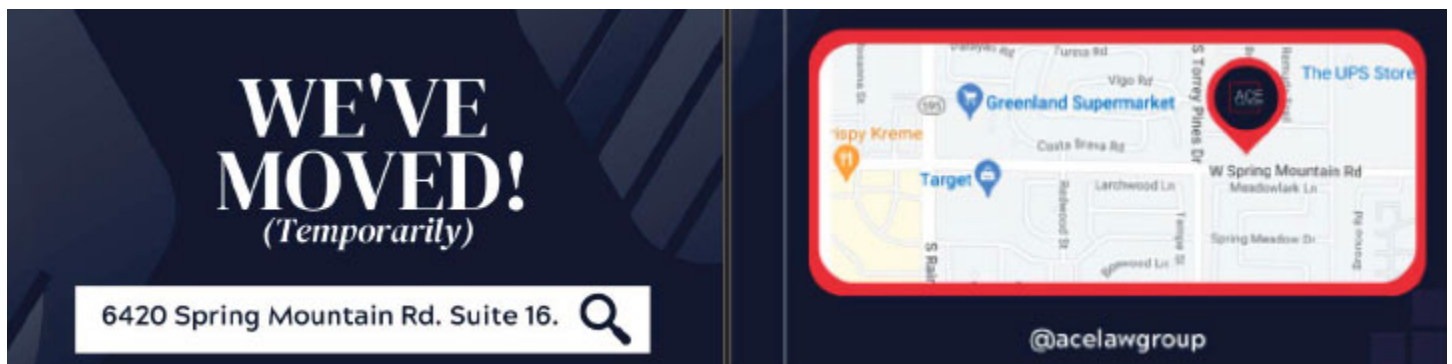
[EXTERNAL EMAIL]

You can affix my e-signature on behalf of the Plaintiff.

Thank you.

--

Kyle R. Tatum, Esq.
Partner
Se habla español



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